

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2015 SEP 18 AM 11:4

DEPUTY CLERK

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:14-CR-466-B

ROBERTO VASQUEZ, JR. (48)

FACTUAL RESUME

PLEADING TO: COUNT SEVENTEEN:
False Statement in an Application for a U.S. Passport
In Violation of 18 U.S.C. § 1542.

ELEMENTS OF THE OFFENSE:

In order to prove a violation of 18 U.S.C. § 1542, False Statement in an Application for U.S. Passport, the United States must prove each of the following elements beyond a reasonable doubt:

- First: That the Defendant made a false statement in an application for a United States passport;
- Second: That the Defendant made the statement intending to obtain a U.S. Passport for his or someone else's use;
- Third: That the Defendant acted knowingly and willingly.

STIPULATED FACTS:

Robert Vasquez, Jr. ("Defendant"), admits that, on or about December 16, 2013, in the Dallas Division of the Northern District of Texas, he knowingly and willfully made a false statement in an application to obtain a United States passport.

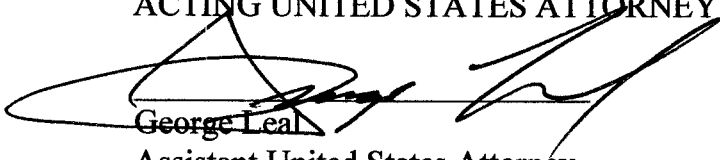
Specifically, Robert Vasquez, Jr. provided a photograph of Israel Vasquez in an effort to obtain a U.S. Passport for Israel Vasquez under the name of Roberto Vasquez, Jr. Robert Vasquez Jr. then certified under penalty of perjury that the photograph submitted with the U.S. Passport Application was a genuine and current photograph of him (Roberto Vasquez, Jr.) In truth and in fact, however, Roberto Vasquez, Jr. knew the photograph was not of him but was in fact a photograph of Israel Vasquez. Roberto Vasquez, Jr. knew he had no right to a United States passport under these circumstances.


NOTHING FURTHER ON THIS PAGE

Roberto Vasquez, Jr. admits he violated 18 U.S.C. § 1542 by making the false statement saying he was the person in the photograph, under penalty of perjury, when in truth and in fact he was not. Roberto Vasquez, Jr. also admits he knowingly and willingly made the false statement intending to obtain the passport for the use of Israel Vasquez and that this occurred in the Northern District of Texas. Roberto Vasquez, Jr. further admits he was aided and abetted in his effort to obtain this passport on behalf of Israel Vasquez by Mia Vasquez.

AGREED TO AND SIGNED this 14 day of Sept, 20 15.

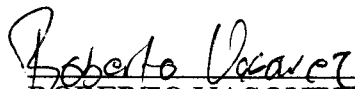
JOHN R. PARKER
ACTING UNITED STATES ATTORNEY


George Leal
Assistant United States Attorney
Texas State Bar No. 00794150
1100 Commerce St., Suite 300
Dallas, Texas 75242

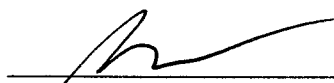

John/Kull
Assistant U.S. Attorney
Texas Bar No. 00794150
1100 Commerce St., Suite 300
Dallas, Texas 75242

Rick Calvert

Deputy Criminal Chief
Texas State Bar No. 03669700


ROBERTO VASQUEZ, JR.
Defendant

9-16-15
Date


BROOK BUSBEE
Attorney for the Defendant

Sept 15 2015
Date